

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the
 ? District of ?

? Division

Katie Marie Barr

Juno Barr

Bethany Barr

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

The State of Oregon

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

6:23-cv-659 MC

(to be filled in by the Clerk's Office)

Jury Trial: (check one)

☐

Yes

☒

No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Address

County

Telephone Number

E-Mail Address

Katie Barr
 300 West Holley RD. G5
 Sweet home OR 97386
City State Zip Code
 Linn
 541-401-9770
 KatieWithaChair@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Jennifer Strunk
 Supervisor
 118 2nd AVE
 Albany OR 97321
City State Zip Code
 Linn
 541-497-9806

☐ Individual capacity ☒ Official capacity

Defendant No. 2

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Tracy Jamison
 Case manager
 118 2nd AVE
 Albany OR 97321
City State Zip Code
 Linn
 503-871-3941

☐ Individual capacity ☒ Official capacity

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

Defendant No. 3

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Andrea Bellows

Supervisor

118 2nd Ave

Albany

City

OR

State

97321

Zip Code

Linn

971-301-0941

☐

Individual capacity

☒

Official capacity

Defendant No. 4

Name

Job or Title (if known)

Address

County

Telephone Number

E-Mail Address (if known)

Heather Strickland

Supervisor

118 2nd Ave

Albany

City

OR

State

97321

Zip Code

Linn

541-452-1896

☐

Individual capacity

☒

Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐Federal officials (a *Bivens* claim)☒

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Title 18 section 242

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

each defendant has denied contact with Parent and continue to hold property while Denying myself any resources for assistance

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Albany child welfare Oregon Linn County
private property Natural rights

- B. What date and approximate time did the events giving rise to your claim(s) occur?

August 2021 - present day.

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

agents engaged in malicious gossip, slander and repeatedly disregarded real reports of abuse and torture, state torture, and police involvement have reached every edge of my home state. Terrorist Attack children are in danger of trafficking and torture

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

- mental health -
 - Depression -
 - grief -
 - Loss -
 - Torture -
 emotional impact on children - **ACE** -
 and Saunders have new research on
 cases like this case.
 Post Separation abuse
 Adverse Childhood Experiences,

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I request to have Juno Barr and
 Bethany Barr returned to my
 care and custody -

By,
 Katie Marie Barr

5-3-2023

300 West Holley GS
 Sweet Home OR 97386
 katiewithachair@gmail.com
 541-401-9770

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 5-3-2023

Signature of Plaintiff

Printed Name of Plaintiff

Katie Marie Burr
Katie Marie Burr

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

FILED 4 MAY '23 10:38 USDC-ORF

Bethany Barr ✓
 Katie Barr ✓
 Jeno Barr ✓
 Plaintiff(s),

v.
 The State of
 Oregon.
 Defendant(s).

Case No.:

23JV000696
 23JV000695
 23JV000698
 23JV000693

**Consent to Jurisdiction by a Magistrate Judge
 and Designation of the Normal Appeal Route**

Pursuant to Fed. R. Civ. P. 73(b), as counsel for the party (parties) identified below, I consent to have a United States Magistrate Judge conduct any and all proceedings in this case, including entry of orders on dispositive motions, trial, and entry of final judgment. I understand that withholding consent will not result in any adverse consequences. Pursuant to Fed. R. Civ. P. 73(c), I agree that an appeal from a judgment entered at a Magistrate Judge's direction may be taken to the court of appeals as would any other appeal from a district court judgment.

Dated: 5-3-2023.

Signature:

Katie Marie Barr

Name and Bar Number:

NA Katie Marie Barr

E-mail Address:

katiewithachair@gmail.com

Firm Name:

NA

Mailing Address:

300 west holley RD G5

City, State, Zip:

Sweet home OR 97380

Party Represented:

Self

Notice to part

4/28/23, 6:35 PM

Gmail - KB In Person Visitation Meeting



Mother Goose <katiewithachair@gmail.com>

KB In Person Visitation Meeting

2 messages

Bellows Andrea <Andrea.Bellows2@odhs.oregon.gov> Fri, Apr 28, 2023 at 4:30 PM
 To: "katiewithachair@gmail.com" <katiewithachair@gmail.com>, Jamison Tracy A <TRACY.A.JAMISON@odhs.oregon.gov>, Hack Cody <Cody.Hack@doj.state.or.us>, "andreaboucherlaw@gmail.com" <andreaboucherlaw@gmail.com>, STRICKLAND Heather <Heather.STRICKLAND@odhs.oregon.gov>

For people who speak or use a language other than English, people with disabilities or people who need additional support, we can provide free help to participate in this meeting. Please call or email the meeting organizer. We accept all relay calls. ODHS and OHA staff can click on this link if they need help with a request.

Microsoft Teams meeting**Join on your computer, mobile app or room device**[Click here to join the meeting](#)

Meeting ID: 272 721 542 446
 Passcode: QRM3CW

[Download Teams](#) | [Join on the web](#)**Or call in (audio only)**

+1 971-277-2343,,959983682# United States, Portland

Phone Conference ID: 959 983 682#

[Find a local number](#) | [Reset PIN](#)

For technical assistance, DHS and OHA employees please contact the OIS Service Desk; guests, please click the "Learn more about Teams" link.

[Learn More](#) | [Meeting options](#)

Mother Goose <katiewithachair@gmail.com>

Fri, Apr 28, 2023 at 6:10 PM

<https://mail.google.com/mail/u/0/?ik=873b05a75f&view=pt&search=all&permthid=thread-f:1764464677655804165&siml=msg-f:17644646776558041...> 1/2

4/28/23, 6:35 PM

Gmail - KB In Person Visitation Meeting

To: Bellows Andrea <Andrea.Bellows2@odhs.oregon.gov>
 Cc: Jamison Tracy A <TRACY.A.JAMISON@odhs.oregon.gov>, Hack Cody <Cody.Hack@doj.state.or.us>, andreaboucherlaw@gmail.com, STRICKLAND Heather <Heather.STRICKLAND@odhs.oregon.gov>

I will be mailing my records, messages, denial letters ,engagements and ALL my personal past childhood experiences with the very agency my children are in the care of.

I was tortured by child welfare I have evidence from birth and witnesses to support all allegations. My mother received a grant for 25,000 dollars.

I was a infant I am now remembering ...clear as day.. Amen to that much..

From hear on. (I'm taking this as a direct terrorist attack on a private citizens home and privacy,I myself, and my children.)I am holding my title to my babies(birth certificates)on-hand like a restraining order... only because ,the state, of Oregon, is hiding the whereabouts of my minor children keeping them captive in a torture environment excluding them from all family that was primary care giver for the first 2 years of life.

Eliminated and rejected contact for months..

I have all documentation..

Going out to federal courts..

Please I only have the mocking silence and my reality that this state is subjecting my family to cruel torture. This organization. "(trafficking under ground).

I believe the Lutheran church" Valley life church" is a "(source) "I and I believe tracey and foster parents also heather strickland beings prior or possible state police employment.

Also thanks for arrange the meeting. Much appreciated.....

Also Lebanon police station I believe are also working together ading the organized trafficking and torture of children and Women mothers. in care of child welfare and in care of treatment."substance abuse" . I'm mailing my report to the federal courts... Call me or email me if you want to give me kids" TODAY "

I l've made notice..4/28/2023

6:05PM.

5414019770

TEXT ONLY

CALL FOR RETURN OF PROPERTY

5414019770

300 WEST HOLLEY RD APT G5

SWEETHOME OR,97386

By ,

Katie Marie barr.

4/28/2023

5414019770

[Quoted text hidden]

<https://mail.google.com/mail/u/0/?ik=873b05a75f&view=pt&search=all&permthid=thread-f:1764464677655804165&siml=msg-f:17644646776558041...> 2/2